Case 3:17-cv-00198-BEN-WVG Document 1 Filed 02/01/17 PageID.1 Page 1 of 27 THANY L. DENEN FILED : 4621 LAMANT St. #57 Pacific Beach FEB-199419:23 ne Phone: 858-262-0552 CLERK. U.S. RISTRICT EDUR Name: 1 Address: 2 3 **Telephone** Phone: J.S. DISTRICT COURT DISTRICT OF CALIFORNIA tiftany, denen Comail. com Email: 4 ML 5 6 7 8 **UNITED STATES DISTRICT COURT** SOUTHERN DISTRICT OF CALIFORNIA 9 10Case No.:17 CV 0198 BEN WVG 11 (assigned at time of filing) 12 Tiffany L. Dehen Plaintiff(s Donn DOE Twitter, Inc. University of San Diego 13 Plaintiff(s), **COMPLAINT** 14 v. 15 16 17 Defendant(s). 18 19 I. **RELATED CASES** 20Do you have other Civil Case(s) in this or any other federal court? 21 a. **U**Yes **XN**o 22 If yes, please list the case numbers here: b. 23 24 **STATEMENT OF CLAIM** (Briefly state the facts of your case. Describe how II. 25 each defendant is involved, and tell what each defendant did to vou that caused 26 you to file this suit against them. Include names of any other persons involved, 27 dates, and places.) 28

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Case 3:17-cv-00198-BEN-WVG Document 1 Filed 02/01/17 PageID.2 Page 2 of 27 Please see attachment titled "Brief" please allow amended complaint to be submitted - Need to obtain counsel. 

Case 3:17-cv-00198-BEN-WVG Document 1 Filed 02/01/17 PageID.3 Page 3 of 27 III. **RELIEF YOU REQUEST** (State exactly what you want the court to do for you. Do not use this space to state the facts of your claim.) Please see attachment titled "Brief" Please allow amended complaint to be submitted 

Case 3:17-cv-00198-BEN-WVG Document 1 Filed 02/01/17 PageID.4 Page 4 of 27 **DEMAND FOR JURY TRIAL** (Would you like a trial by jury on all claims IV. pursuant to FRCP, Rule 38?) **X**-Xes □ No I declare under penalty of perjury that the foregoing is frue and correct. Signature Date enon Printed Name N 

## Tiffany Dehen v. John Doe, Twitter Inc., and University of San Diego

Tiffany Dehen alleges defamation per se and intentional infliction of emotional distress against John Doe and Twitter Inc. for a slanderous Twitter account made in Plaintiff's legal name and broadcast internationally on the social media website known as Twitter, Inc. and enjoins University of San Diego for contributory negligence.

Plaintiff requests the court to immediately and expeditiously freeze all evidence associated with all possible offenses perpetrated by the plaintiff, John Doe, Twitter, Inc., and University of San Diego. Plaintiff requests \$100,000,000 in damages against all defendants jointly and severally liable.

John Doe made a false twitter account claiming to be plaintiff, in which Doe posted incriminating photos and language as an alleged parody, yet used and tagged Plaintiff's actual real name (Tiffany Dehen) and Twitter account (@tiffanysundevil). John Doe's actions satisfy all five elements of a statutory malicious defamation claim, as follows:

- 1. John Doe published a statement of fact on the social media platform known as Twitter, as shown in Exhibits 1 32.
- 2. The statements falsely attempt to represent plaintiff, as evidenced by the usage of plaintiff's first and last name as the official Twitter username. Plaintiff's real Twitter account is shown in Exhibit 33.
- 3. This usage of plaintiff's first and last name used in conjuction with views associated with Hitler's Nazi Germany are damaging to plaintiff's name, especially in this crucial juncture of her life where she is applying to California bar admittance and looking for a legal job in San Diego. It is a known fact law firms nowadays check social media sites and do background and Google searches before reaching out to a potential candidate.
- 4. John Doe represented plaintiff as an Adolf Hitler Nazi Germany supporter, which has a natural tendency to injure plaintiff, as well as cause special damage, considering the fact that plaintiff is actively seeking a job position in the legal field. See Exhibits 1-32.

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5. John Doe's fault in publishing the statement amounted to substantially more than just negligence. John Doe's meticulous planning of potentially creating a fake Facebook account in which he sought to befriend Plaintiff on social media (Please see Exhibit 38) and gain access to additional information, coupled with the time involved in setting up a false Twitter account, as well as downloading, altering, and reposting plaintiff's images, shows more than just the defendant's fault in publishing the statement. John Doe's deliberate actions amounted to much more than just mere negligence, but more so proves malice, an element of criminal crimes.

Even if the burden is on the plaintiff to prove falsity in a defamation claim, the falsity is easily proven, as evidenced by the fact that John Doe's Twitter account is clearly not Tiffany Dehen's twitter account, as evidenced by the IP address (to be obtained during investigation).

Additionally, it should be noted that Tiffany Dehen's real twitter account consists of posts supporting the elected President of the United States, not Adolf Hitler, the socialist communist dictator from Germany. The fact that John Doe used Tiffany Dehen's real name and linked the fictitious Twitter account to Tiffany Dehen's real account by retweeting Tiffany Dehen's posts shows that John Doe acted with actual malice and negligence.

Further, even if Plaintiff qualifies as a limited purpose public figure as a person who voluntarily injects herself or is drawn into a particular public controversy as a matter of law, Plaintiff alleges the decision in Copp v. Paxton, 52 Cal. Rptr.2d 831, 44 (Cal. Ct. Appl. 1996), is unconstitutional and violates her constitutional rights in this situation and all situations similar to this. The alleged defamation is extremely relevant to the plaintiff's voluntary participation in the public controversy because the plaintiff is currently seeking a job in the legal market, which has instituted a well-known accepted practice for checking a potential job candidate's social media websites when reviewing the applicant, in this case, the plaintiff. Plaintiff is also working on building her own personal website and branding herself, all of which are impeded by this fictitious and slanderous Twitter account in Plaintiff's name.

Plaintiff just graduated law school with a J.D. and even if plaintiff is qualified as an expert for purposes of this case, Plaintiff acted as

expeditiously as she could and filed suit against respondents within one day of being put on notice, which is well documented and easily accessible for the court to review in all enclosed exhibits.

Plaintiff requests the court to immediately and expeditiously freeze all evidence associated with all possible civil, as well as criminal, offenses perpetrated by the plaintiff, John Doe.

Plaintiff requests to enjoin Twitter, Inc. jointly and severally, the social media website which has allowed this disparaging speech to stay broadcast to the world, costing plaintiff potentially millions of dollars in future earnings. Twitter was put on notice on January 30, 2017, and as of Feb 1, 2017, the false twitter account was still posted, even after Tiffany Dehen put Twitter on notice. The process Twitter adheres to is absolutely ridiculous and should be looked at as well and Plaintiff claims the process Twitter has in place to review defamation is unconstitutional.

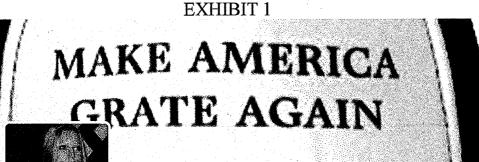
Plaintiff requests to enjoin University of San Diego because of the fact that as seen in Exhibits 34 and 35, it appears as though there is a high probability John Doe is an University of San Diego student or alumni since the photo used to make the swastika headband, as shown in Exhibits 3, 4, and 5, is Plaintiff's profile photograph on LinkedIn. University of San Diego should be liable as well due to a prior matter that was not resolved appropriately by University of San Diego which led to USD acting recklessly, or at the very least negligently, to allow this matter to arise.

Further, on the way to Federal Court in Downtown San Diego to file this complaint, Plaintiff was involved in a collision on the I-5 Freeway headed South, which resulted in neck and back pain for which Plaintiff is now seeking medical attention. Please see Exhibit 39.

Plaintiff seeks \$100,000,000 in damages for the above stated claims of malicious defamation per se and intentional infliction of emotional distress.

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TWEETS

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Tweets

FOLLOWING

20

**Tweets & replies** 

FOLLOWERS

3



#### Tiffany Dehen @tiffanydeben

Parody account. Fiction and political satire about Republican white women.

Praying for America

Tweet to Tiffany Dehen

Tiffany Dehen Giffanydehen 17h ONLY WHITE PEOPLE DESRVE BENEFITS! america should be great to win i no knowledge of it! #MakeAmericaGreatAgain @POTUS @realDonaldTrump

LIKES

10

Media

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A+ Follow

## **EXHIBIT 2**



# Knowledge of it! #iviakeAmericaGreatAgain

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#### @POTUS @realDonaldTrump

Thomas Paine @Thomas1774Paine Hey DOJ & #Yates, welcome back to the real America where you get fired for screwing up like the rest of us. #Obama's Country Club is closed.

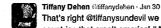
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Tiffany Dehen Stiffanydehen · 17h

#### We don't need a justice department! fuck impartiality! #MakeAmericaGreatAgain

DRUDGE REPORT @DRUDGE\_REPORT TRUMP FIRES ACTING ATTORNEY GENERAL bit.ly/2kmNs7L

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That's right @tiffanysundevil we should just get rid of all those countries that aren't americal #AmericaFirst #AmericaFirstOnly

Tiffany Dehen J.D. @tiffanysundevil THIS IS HEINOUS. What morons. I wish we could not deal with countries who are so stupid. twitter.com/drudge\_report/...

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With M Monte Curry Cherry

Tiffany Dehen @tiffanydehen · 17h

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Tiffany Dehen Stiffanydehen - Jan 30

Tiffany Dehen J.D. @tiffanysundevil

DRUDGE REPORT @DRUDGE\_REPORT



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Who to follow - Befresh - View all



assica Proud @jessicaproud 🔗 Followed by Brett Mecum A+ Follow

Kevin Curry @kcurryl2g Followed by Ira Hayes At Follow

Find friends

Treods - Change Beyoncé Beyoncé is pregnant again!



#### Tiffany Dehen ©tilfanydehen - Jan 30 All ready for my job interview. Too much??? #AmericaFirst #AmericaFirstOnly Help me fashion queens!!! @MELANIATRUMP

We don't need a justice department! fuck impartiality! #MakeAmericaGreatAgain

TRUMP FIRES ACTING ATTORNEY GENERAL bit.ly/2kmNs7L

That's right @tiffanysundevil we should just get rid of all those

countries that aren't americal #AmericaFirst #AmericaFirstOnly

THIS IS HEINOUS, What morons, I wish we could not deal with countries

63

who are so stupid. twitter.com/drudge\_report/...

63



**EXHIBIT 4** 

Who to follow · Refresh · View all

Sarah Killen @LovelyButton A. Follow



ssica Proud ©jessicaproud Followed by Brett Mecum



Kevin Curry @kcurryl2g Followed by Ira Hayes A\* Follow

Find friends

Trends - Change

Beyoncé Beyoncé is pregnant again!

#NationalLINC

Frederick Douglass 49.1K Tweets

#wednesdaywisdom 61K Tweets

Black History Month Celebrating the start of Black History Month

**Rex Tillerson** 



Tiffany Dehen Otiffanydehen - Jan 30

That's right @tiffanysundevil we should just get rid of all those countries that aren't americal #AmericaFirst #AmericaFirstOnly

Tiffany Dehen J.D. @tiffanysundevil THIS IS HEINOUS. What morons. I wish we could not deal with countries who are so stupid. twitter.com/drudge\_report/...

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Tiffany Dehen Stiffanydehen - Jan 30

All ready for my job interview. Too much??? #AmericaFirst #AmericaFirstOnly Help me fashion queensIII @MELANIATRUMP @KellyannePolls



Tiffany Dehen dtiffanydehen - Jan 30 Here's my mom and her bible study sisters Case 3:17-cv-00198-BEN-WVG Document 1 Filed 02/01/17 PageID.10 Page 10 of 27



Celebrating the start of Black History Month

Rex Tillerson Senata confirms Rex Tillerson as Secretary of State

#WatermarkConf 3,245 Tweets

#PressOn Øbenshapiro is Tweeting about this

DeVos Betsy DeVos' confirmation hangs in the balance

Dover 6,844 Tweets

. . . . . . . .

92017 De Ny - Mircan Piles Rost Novel - Carllins Ref 1975 :

#### EXHIBIT 6

Tiffany Dehen Gtiffanydehen Jan 30 Here's my mom and her bible study sisters being saved from an evil Muslim palace. If I'm not her spitting image... GO TRUMP GO! @POTUS



Tiffany Dehen Gtiffanydehen Jan 30 I'm so excited for my audition for TV! I can't wait to make America proud!



Tiffany Dehen Stiffanydehen Jan 30 I'm so excited for my audition for TV! I can't wait to make America proud! #MakeAmericaGreatAgain #AmericaFirst #AmericaFirstOnly @POTUS

BRAVO's The Real Housewives of Nazi-Occupied Russian Territory Formerly Known as America

#### \*twirls\*

"If he's not Aryan, we're not marryin'!"



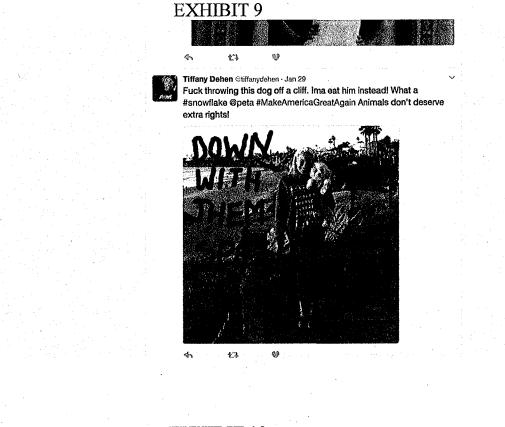
#### **EXHIBIT 8**



Tiffany Dehen Gtiffanydehen - Jan 29

Fuck throwing this dog off a cliff. Ima eat him instead! What a #snowflake @peta #MakeAmericaGreatAgain Animals don't deserve extra rights!









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Tiffany Dehen @tiffanydehen - Jan 29

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I agree with @SpeakerRyan do what you can to keep them Jews out of our Christian country!! #AmericaFirst #MakeAmericaGreatAgain #MuslimBan

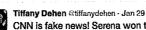


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#### Paul Ryan @SpeakerRyan

RT if you agree ---- It's time to rebuild our partnership with #Israel and reaffirm our commitment to her security.



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CNN is fake news! Serena won the Australian open!

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CNN Breaking News @cnnbrk Roger Federer beats Rafael Nadal in a five-set match in the Australian Open Men's Final winning his 18th grand slam. cnn.it/2kHdrnk

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Tiffany Dehen @tiffanydehen - Jan 29 That'll teach them terrorist saudis! #MuclimDon #MakeAmericaCreatAgain

#### EXHIBIT 12 Tiffany Dehen Stiffanydehen - Jan 29

CNN is fake news! Serena won the Australian open!

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CNN Breaking News @conbrk Roger Federer beats Rafael Nadal in a five-set match in the Australian Open Men's Final winning his 18th grand slam. cnn.it/2kHdmk

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Tiffany Dehen Stiffanydehen - Jan 29 That'll teach them terrorist saudis! #MuslimBan #MakeAmericaGreatAgain my hero! @POTUS @realDonaldTrump



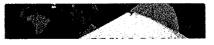


Tilfany Dehen Stilfanydehen Jan 29 That'll teach them terrorist saudis! #MuslimBan #MakeAmericaGreatAgain my hero! @POTUS @realDonaldTrump





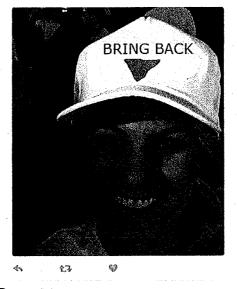
Tiffany Dehen Stiffanydehen - Jan 29 Why do the gays hate this hat? I thought they all liked fashion! #snowflakes #EndSpecialInterests #ReligiousFreedom #MakeAmericaGreatAgain



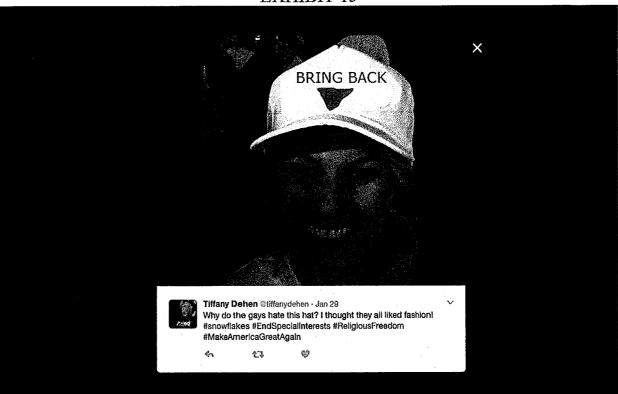
# **EXHIBIT 14**



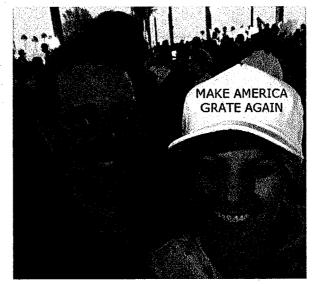
Tiffany Dehen @tiffanydehen · Jan 29 Why do the gays hate this hat? I thought they all liked fashion! #snowflakes #EndSpecialInterests #ReligiousFreedom #MakeAmericaGreatAgain



Tiffany Dehen @tiffanydehen · Jan 29 Saving myself for marriage! My man knows



Tilfany Dehen Stiffanydehen Jan 29 Saving myself for marriage! My man knows we can have sex 3 times: honeymoon, Trump's reelection, & jesus 2nd coming! #MakeAmericaGreatAgain







Tiffany Dehen Stiffanydehen - Jan 29 Throwing this dog over this cliff! Animals don't deserve special rights!

Down with special interists! #MakeAmericaGreatAgain @POTUS

SON

Tiffany Dehen & tiffanydehen - Jan 29 Donated some eggs today! Don't know why sent they told me they were tax deductible!

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**EXHIBIT 19** 



# EXHIBIT 20



Tiffany Dehen @tiffanydehen Jan 29 Donated some eggs today! Don't know why sept they told me they were tax deductible! #MakeAmericaGreatAgain





#### **EXHIBIT 22** \$ **£**73 Ŷ Tiffany Dehen ©tiffanydehen - Jan 28 Nothing like my own personal welcome team to Twitter. Thanks @AdolfHitlerFuhr XOXO Let's #MakeAmericaGreatAgain studcakes #MuslimBan Fuhrer welcomes you 14h ¢., **纪**子 6 Tiffany Dehen Stiffanydehen - Jan 28 Have y'all noticed the blacks are on all the magazines nowadays? Time 4 change!! White women are the silent majority in the lamestream media 4 23 靀 Tiffany Dehen @tiffanydehen - Jan 28 Just found this lovely pic of our #firstladymelania Pearl necklaces 4 every girl about time @MELANIATRUMP @POTUS

**EXHIBIT 23** Tiffany Dehen ©tiffanydehen - Jan 28 Nothing like my own personal welcome team to Twitter. Thanks @AdolfHitlerFuhr XOXO Let's #MakeAmericaGreatAgain studcakes #MuslimBan Fuhrer welcomes you 14h <u>^</u>\_7 Tiffany Dehen @tiffanydehen - Jan 28 Have y'all noticed the blacks are on all the magazines nowadays? Time 4 change!! White women are the silent majority in the lamestream media \$ 创 C Tiffany Dehen Stiffanydehen - Jan 28 Just found this lovely pic of our #firstladymelania Pearl necklaces 4 every girl about time @MELANIATRUMP @POTUS #MakeAmericaGreatAgain

### EXHIBIT 24

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Tiffany Dehen @tiffanydehen - Jan 28 Have y'all noticed the blacks are on all the magazines nowadays? Time 4 change!! White women are the silent majority in the lamestream media



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Tiffany Dehen Stiffanydehen Jan 28 Just found this lovely pic of our #firstladymelania Pearl necklaces 4 every girl about time @MELANIATRUMP @POTUS #MakeAmericaGreatAgain





Tiffany De

Tiffany Dehen & tiffanydehen - Jan 28 TO HELL WITH MUSLIMS WHO WANT TO BAN OUR AMERICAN VALUES! U NEVER PUT ME IN A BURKA! #MuslimBan #MakeAmericaGreatAgain @POTUS #BuildTheWall



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#### EXHIBIT 26

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Tiffany Dehen @tiffanydehen Jan 28 TO HELL WITH MUSLIMS WHO WANT TO BAN OUR AMERICAN VALUES! U NEVER PUT ME IN A BURKA! #MuslimBan #MakeAmericaGreatAgain @POTUS #BuildTheWall

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Tiffany Dehen @tiffanydehen - Jan 28

My gawd Who is that lucky lady? @POTUS @realDonaldTrump My pastor wouldn't be happy with my inside-outies right now? #MakeAmericaGreatAgain



Tiffany Dehen Gtiffanydehen - Jan 28 My gawd Who is that lucky lady? @POTUS @realDonaldTrump My pastor wouldn't be happy with my inside-outies right now? #MakeAmericaGreatAgain



Tiffany Dehen © tiffanydehen Jan 28 Me+my girls today. If you can't bring back

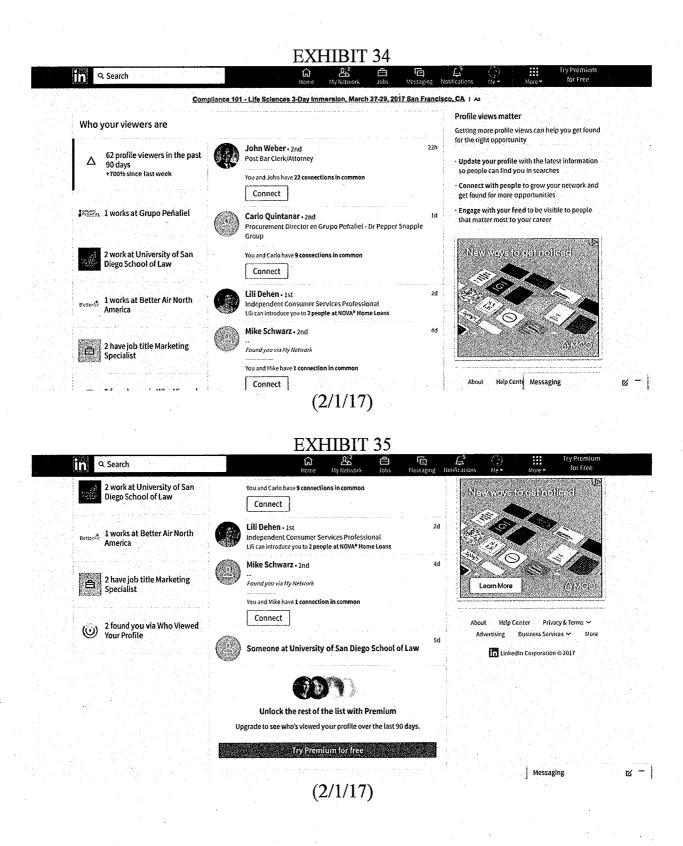
# EXHIBIT 28

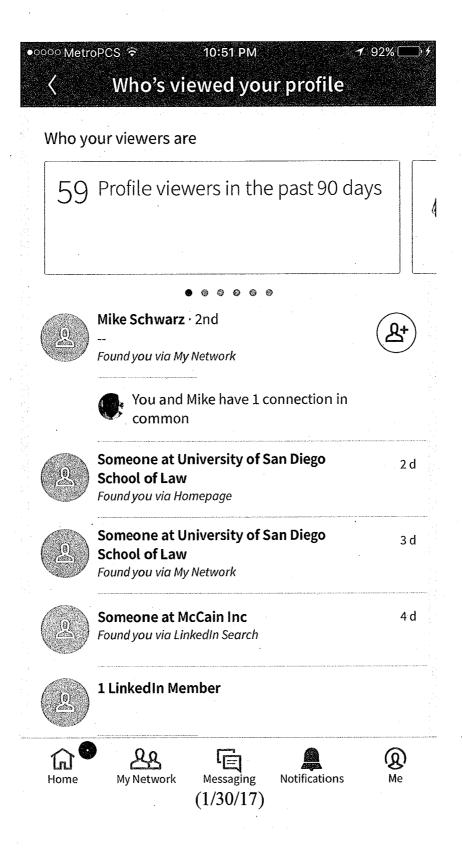
Tiffany Dehen Gtiffanydehen Jan 28 Me+my girls today. If you can't bring back an 80's dye job, U DON'T DESERVE TO BE AMERICAN!!! #MakeAmericaGreatAgain #SexyLikeCockatoos #grl





Tiffany Dehen Stiffanydehen Jan 27 The only better time to be a woman in America beside 2day was the day Jesus was crucified #witness #amen #Jesusfirst





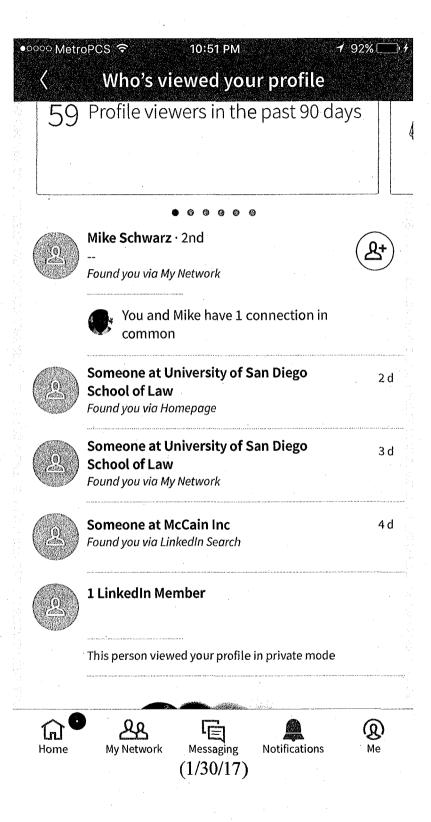


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Invit	e Facebook User to Messenger
	JAN 26, 5:03 PM

Hey sorry I didn't recognize your name have we met before!

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They accepted your request.

You can't reply to this conversation. More options.

(2/1/17)

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#### IMPORTANT - READ CAREFULLY

Keep this report. This is your record of this accident. To comply with California Vehicle Code (VC) Section 20002 (duty where property damaged), you must oither:

- a. Give the owner or person in charge of such property the name and address of the driver and owner of the vehicle; or in the absence of the owner,
- b. Leave a written notice in a conspicuous place on the other vehicle or damaged property, giving the name and address of the driver and owner of the vehicle involved and a statement of the circumstances.

This information is necessary for the completion of your state SR-1 Form, Report of Traffic Accident, and your insurance report.

#### **VEHICLE CODE SECTION 16000**

The driver of a vehicle involved in an accident resulting in damage to the property of any ONE party in excess of \$750 or in the injury or death of any person MUST submit a SR-1 Form to the California Department of Motor Vehicles within 10 days, or as soon as possible.

Note: Failure to comply may result in suspension of your driver's license.

Form SR-1 may be obtained from the Department of Motor Vchicles, the California Highway Patrol, any police station, motor vchicle club, insurance agent, or DMV internet web site (SR-1A).

If city or state property is damaged, you will be contacted regarding possible liability.

Law enforcement reports do not satisfy the DMV report requirement.

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private lever and the works in the alloud at we the purch DAY YEAR (BUWWARHIGHLE 25**371** 1231 11(7.4 200.) 38 Byon that give with the hole hour of the way of 17 who where block and gll was +1 7510 70 0111 36 7517 Inpagan . pinnt youn MY pozdals st '97 Denis-100 p wy -the deside mito owns TN. \* V Z Ŷ 10017 and the the weak who đ (TAWARY) 231 MADI ENVIOLA MARAOLM أم لم 20 1147 ZINVM 22 nd with their es therp mus 5 41 ₽**J** 411/0 12 provide the start was the provided JUNC 50 my april SIN RAM hISTORIAD NUM (ANV) 61 ton pin and prio union 54 OVIN TOM 81 MA SULL AND and him Ŧ. NYM. . OM ny 21 NORTON MIN dawn with the second SIM 91 my middle of the humanian VJ TIM 'S!  $\zeta_{iM}$ SLOWL WY COLD I'VE CLE ISWUL IN MY VNNIN t, the while all dent and 2257NUM p2.Ar *WW* 61 OWN \$ 8506 MAS OMINIO O GUME SINS MUNICAL 15 却 -210-610 SMDIIM HOR SSAUGH 0,141 11 WH allow os a get MIS I canse plate I have 10 hut alward him and did SW SO WAS 6 out all the durie sund in his previous TIM ovn 官 pra toy mu - WA MACK RW Ð 217199 M w 1 20 1 50 1.95 Q FARY TID D TVA. Į NC MUT 9 the one one by the the ing WADY M Ϋ́ς PANNY (HARA PW POWMU) M pwpg utns ţ, oup ny Was traveling afri the buryours Έ THAT SMALL AN LOUNES JEHRES THOSIDO PLANU SV 3 Part bed town that sweeved left what his love, and ٦. 20 L 22 140 CM IDO 21373°2113 **CIPESHRO** B WERE SIGN 100+0 ITEL NO SHIND TO HIND